

STATE OF MINNESOTA
 COUNTY OF CARVER

DISTRICT COURT
 FIRST JUDICIAL DISTRICT
 PROBATE DIVISION

In the Matter of:

Court File No. 10-PR-16-46
 Judge Kevin W. Eide

Estate of Prince Rogers Nelson,

 Decedent.

**ORDER ON COMERICA BANK & TRUST,
 N.A.'S MOTION TO APPROVE
 STIPULATION OF SETTLED ISSUES
 WITH THE IRS AND AGREEMENT AS TO
 TAX LIABILITY WITH THE MNDOR**

The above-entitled matter came before the undersigned on January 14, 2022, without a hearing, upon Comerica Bank & Trust, N.A.'s ("Comerica's") Motion to Approve Stipulation of Settled Issues with the Internal Revenue Service ("IRS") and Agreement as to Tax Liability with the Minnesota Department of Revenue ("MNDOR"). Attached as an exhibit to the motion were consents to the motion executed by each of the members of the Heir Group (consisting of Tyka Nelson, Sharon Nelson, Norrine Nelson, the trustees of the John R. Nelson Revocable Trust, Primary Wave, L. Londell McMillan, and Charles Spicer). Based upon the motion, the consents, and all of the files, records, and proceedings herein, the Court makes the following:

ORDER

1. Comerica's motion is granted. In the motion, Comerica reiterates what it has communicated to the Court and the parties on multiple occasions—that had the Heir Group supported such efforts, Comerica believes it could have obtained additional tax savings through further negotiations and litigation with the IRS and MNDOR. The members of the Heir Group, however, made it very clear in their communications with Comerica and the Court that they prioritized as rapid of a resolution as possible of the amount of the Estate's tax liabilities, even

though it would come at the expense of potential additional tax savings. Every member of the Heir Group has also filed a consent to Comerica's motion. In light of these circumstances, the Court finds that the Estate's agreements with the IRS and MNDOR, attached as Exhibits A and B to Comerica's motion, are in the best interests of the Estate, including based on the substantial savings on taxes, asserted penalties, and interests that Comerica was able to negotiate with the taxing authorities.

2. Comerica is authorized to enter into settlement agreements with the IRS and MNDOR substantially in the form of Exhibits A and B to Comerica's motion.

Dated: January 18, 2022 BY THE COURT:

Kevin W. Eide
Judge of District Court

NOTICE: A true and correct copy of this Order/Notice has been served by EFS upon the parties. Please be advised that orders/notices sent to attorneys are sent to the lead attorney only.